Exhibit 4 (Part II of II)

















Underfying Image PPGNPR1060693-976

100 0 100 200 Feet N 100 0 100 200 Fee Approximate Scale and North Arrow

Use Glasses for Stereo Viewing



3-D Image 5/7/1962 Jersey City, NJ Photo Source: INTRASEARCH





Control Points and Check Points

Attachment C

Randall Wayne Grip, Vice-President, Aero-Data Corporation

Education: Louisiana State University, BS in Geography (1996); Mapping Sciences emphasis.

Mr. Grip's course work included graduate level courses in photo interpretation, GIS mapping, GPS surveying and remote sensing with an emphasis in environmental

applications.

Professional Experience:

September 2003 to Present Aero-Data Corporation, Baton Rouge, LA.

Vice-President

As company vice-president, Mr. Grip has directed all aspects of projects including photographic printing, photo interpretation, photogrammetry, and image research and acquisition. He has experience in digital image production and geographic information systems using Digital Photogrammetric Workstations and ESRI GIS. Mr. Grip has been involved in approximately two hundred mapping projects while at Aero-Data. During this time he has been trained and supervised by Wayne M. Grip, Aero-Data's co-founder and principal owner.

Aero-Data specializes in aerial photography and mapping, environmental photointerpretation, and geographic information systems. The company was founded in 1983. It has completed over fifty oil field studies since its founding. Aero-Data has a complete photo laboratory and two airplanes as well as aerial mapping cameras, GPS surveying and navigation receivers, and digital stereoplotter/photointerpretation work stations.

Aero-Data's projects number over 700 sites in 32 different states, to date. They include historical aerial photography-based hazardous waste site investigations; oil field investigations; environmental audits; accident site investigations; annual site documentation using aerial photography and video; contour mapping of plant sites; stockpile volume determinations; geographic information systems; and coastal zone erosion studies.

Aero-Data's client list includes many of the major corporations and law firms in the United States as well as government agencies such as the U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, U.S. Soil Conservation Service, U.S. Department of Justice, the Louisiana Department of Transportation and Development, the Louisiana Department of Natural Resources, and the Louisiana Department of Environmental Quality.

July 1995 to September 2003 Aero-Data Corporation, Baton Rouge, LA,

Project Manager III

August 1990 to July 1995 Aero-Data Corporation, Baton Rouge, LA.

Photolab Specialist

While obtaining his university degree, Mr. Grip worked as a photo lab specialist and aerial camera operator for Aero-Data Corporation.

Attachment D

Expert Testimony of the Past Five Years and Publications of Randall Grip

Trial Testimony

11/16/2012 Edward Oneal vs. Thelma Sue Oneal Burcham et al

19th Judicial District Court Parish of East Baton Rouge

Case No. C596384

Historical Imagery Review and Mapping

11/17/2015 William Lane Stephenson, et al v. Wildcat Midstream Caddo, LLC

42nd Judicial District Court Parish of DeSoto

Case No. 74,224-A

Historical Imagery Review and Mapping

Photointerpretation & Photogrammetry

Photointerpretation & Photogrammetry

Deposition Testimony

8/9/2012 Edward Oneal vs. Thelma Sue Oneal Burcham et al

19th Judicial District Court Parish of East Baton Rouge

Case No. C596384

Historical Imagery Review and Mapping

2/26/2013 Edward Leblanc vs Borgwarner Morse Tec Inc. et al

Civil District Court for the Parish of Orleans

CDC No. 2012-7620, Section:12-H

Historical Imagery Review, Mapping, and Plaintiff Geocoding

12/16/2014 Blue Tee Corp. and Gold Fields Mining, LLC v. XTRA Intermodal, Inc., et al. Photointerpretation & Photogrammetry

United States District Court for the Southern District of Illinois

No. 3:13-cv-00830-DRH

Historical Imagery Review, Photointerpretation and Mapping

12/22/2014 Clyde A. Tucker et al vs Shell Oil Company, et al.

3rd Judicial District for the Parish of Union

State of Louisiana Docket No. 42934

Historical Imagery Review, Photointerpretation and Mapping

9/23/2015 Ericsson Inc. et al., v. Ace American Insurance Company, et al.

State of Indiana

Marion County Superior Court Cause No.: 49D05-0807-PL-030958

Historical Imagery Review, Photointerpretation and Mapping

Type of Work

Type of Work

Photointerpretation & Photogrammetry

Photointerpretation & Photogrammetry

Photointerpretation & Photogrammetry

Photointerpretation & Photogrammetry

Publications

November 2000

Application of Aerial Photography and Photogrammetry in Environmental Forensic Investigations Wayne M Grip, Randatl W. Grip and Robert D. Morrison Journal of Environmental Forensics (2000) 1, 121-129

EXHIBIT 2

Supplemental Report

and Rebuttal Report of Kristen Stout's:

Expert Report PPG Industries, Inc Non-Residential Chromium Chemical Production Waste Sites 114, 121, 132, 133, 135, 137, 143, 186, 202, and 207 Jersey City, N.J.

Randall Grip

Roll try

Aero-Data Corporation LLC

January 6, 2017

Scope of Work

My name is Randall W. Grip. I have a Bachelor of Science Degree in Geography from Louisiana State University. I am Vice-President of Aero-Data Corporation. Aero-Data specializes in aerial mapping and environmental studies using aerial photography and historical maps. Over the past 19 years, I have provided expert photo-interpretation and photogrammetry services for environmental assessment purposes. In the course of this work, I have participated in studies and obtained and interpreted aerial photographs of sites throughout the United States as well as in other foreign nations.

My expertise is in the area of review and analysis of readily available aerial photography. The processes I use include research and acquisition of stereoscopic photography, high resolution photogrammetric scanning, geo-registration of stereo images, and digital orthophoto production. I have been qualified as an expert witness in the fields of photo-interpretation and photogrammetry.

I have mapped three additional dates which were not included in my October 2016 report as the images were not provided to me and only recently produced by the Government subsequent to the issuance of Ms. Stout's October 2016 expert report. My findings and opinions regarding these images are discussed in the "Supplemental Interpretations by Date" section of this report.

As explained in greater detail below, I have read Ms. Stout's report and reviewed her Figures, including historical aerial photographs and maps. The purpose of my report is to assist the Court in understanding what information about the Site can be derived from these historical aerial photographs and to analyze whether Ms. Stout's interpretation of the aerial photographs are accurate. My comments and rebuttal opinions are outlined in the "General Rebuttal Opinions" section of this report. My opinions are provided to a reasonable degree of scientific and professional certainty. I reserve the right to supplement or further expand upon my opinions.

Documents and Information Relied Upon

The opinions expressed in this report are based upon my review of Ms. Stout's October 6, 2016 expert report, including the ground photography and vertical aerial photography, and my experience and training. The additional dates and sources of aerial photography are as follows: 10/27/1942 NARA, 4/10/1954 NARA and 11/29/1955 Robinson.

Methodology

In preparing my opinions for this report, I employed the same methods of analysis described in my October 2016 report on this matter.

I found that Ms. Stout's methods differed from mine primarily in the methodology (type of equipment) she used. My methods involve the use of a digital stereoplotter capable of providing stereoscopic viewing of the images at magnification levels ranging from 1x to 128x. The method I employed utilizes georeferenced stereoscopic images, which allows me to measure elevations and rapidly switch between different dates of photography. When switching dates, the measuring point will remain in the same location from date to date. The method I employed facilitates change detection both vertically and horizontally between the dates of photography which are often taken from different altitudes and flight directions. I reviewed both the film and digital images using this method.

In contrast, Ms. Stout's employs an older method for film review. Ms. Stout states that during photographic analysis in this case she used a zoom stereoscope with a light table to view stereo film. This method requires the interpreter to manually change the stereoscopic film pairs for each date. Depending on the complexity of the Site, Ms. Stout's method is cumbersome which may explain some of the misinterpretations discussed herein.

Supplemental Interpretations by Date

The interpretations explained below are for the images subsequently produced by the Government after the serving of Ms. Stout's expert report.

10/27/1942 NARA

The Plant and gas holders remain present.

The stockpiles remain visible, and terrain models were generated for these pile areas to determine the approximate volume. The stereoscopic limits of the photography did not have full coverage and did not include a portion of the south stockpile. In order to compare the date to date volume change of these piles, I assumed the pile area orientation and conditions outside of the stereoscopic coverage to be similar to the 12/22/1943 pile.

The stockpile north of Carteret Avenue is mapped and calculated to be approximately 54,696 cubic yards, and the stockpile south of Carteret Avenue is approximately 189,730 cubic yards. The north stockpile is 39 feet tall at its highest point. The south stockpile is 76 feet tall at its highest point. The north stockpile is 330 feet long and 201 feet wide. The south stockpile is now one large pile, 558 feet long and 256 feet wide.

4/10/1954 NARA

The Plant remains present, and the light toned pile remains visible.

The stockpiles remain visible, and terrain models were generated for these pile areas to determine the approximate volume. The stockpile north of Carteret Avenue is mapped and calculated to be approximately 80,085 cubic yards, and the stockpile south of Carteret Avenue is 147,868 cubic yards. The north stockpile is 55 feet tall at its highest point. The highest point is a placement of light toned material first visible on this date. I have included annotated exhibits delineating the area of light toned material with a cyan colored polygon on this date of imagery and several oblique photos from my original report. The south stockpile is 61 feet tall at its highest point. The north stockpile is 336 feet long and 225 feet wide. The south stockpile is 505 feet long and 237 feet wide.

11/29/1955 Robinson

The Plant remains present, and the light toned pile remains visible.

The stockpiles remain visible, and terrain models were generated for these pile areas to determine the approximate volume. The stockpile north of Carteret Avenue is mapped and calculated to be approximately 52,539 cubic yards, and the stockpile south of Carteret Avenue is 93,109 cubic yards.

The north stockpile is 55 feet tall at its highest point. The south stockpile is 37 feet tall at its highest point. The north stockpile is 252 feet long and 203 feet wide. The south stockpile is 283 feet long and 222 feet wide.

General Rebuttal Opinions

Generally, Ms. Stout's expert report exhibits several reoccurring issues that warrant rebuttal given their impact on her ultimate conclusions. I have explained below several examples of these reoccurring issues. For clarity, I have highlighted Ms. Stout's statements in yellow.

Impact of Methodology on Opinions

First, as I discussed in my methodology section, Ms. Stout's prefers a method of viewing film images using a zoom stereoscope, which hinders the user's ability to accurately detect changes in the images over time. This is in contrast to my method, which allows me to rapidly switch between different dates of photography. My method is extremely useful for change detection. The following example shows a change from one date to the other which Ms. Stout appears to have misinterpreted as relatively unchanged.

For example, in Section 7.9 titled "October 27, 1942 Aerial Photograph" Ms. Stout states: "The large wastes stockpile in the southeastern portion of Site 114 remains approximately as it appeared in the 1940 photograph."

My Comments:

The footprint of the waste stockpile remains approximately the same as in 1940 but a large volume of material has been removed from the top of the pile. Ms. Stout fails to identify this change, which could be due to her use of a zoom stereoscope to view film from varying altitudes and flight directions. My method of using a digital stereoplotter facilitates the photointerpretation of these changes.

Unsupported Factual Statements and Conclusions

Many of Ms. Stout's apparent conclusions cannot be based on aerial interpretation, are speculative, and/or lack citations or references provided in conjunction with the statements.

Example 1 - Ms. Stout's statements concerning the property ownership changes and history of the Site does not rely on aerial photo interpretation alone.

My Comments:

Some of Ms. Stout's comments are not verifiable solely by viewing the aerial imagery.

Example 2 – In Section 5.1 titled "Natural Products Refining Company Property Prior to World War II (1909 – 1940)" Ms. Stout states: "Sometime after the Canal ceased operations in 1912, Natural Products filled the land up to the Canal boat channel. This is evident from the 1919 plat map which shows plant buildings located within the former limits of what had been the Morris Canal's wider sections."

My Comments:

The 1908, 1919, and 1928 plat maps do not have contours or any means of determining ground elevation or ground surface filling. Furthermore, the 1919 plat map depicts the Morris Canal of uniform width with no buildings within its limits. Ms. Stout's observation is not verifiable by viewing the 1919 plat map.

In Section 4.1, Ms. Stout discusses the "Former Morris Canal limits (including the basins and wider sections)" as based on original surveys and mapping by J.R. Bien and C.C. Vermeule, 1891 which she reviewed on Figures 1-2 and 5-1 from the AECOM February 2012 report. I assume the "former limits of what had been the Morris Canal's wider sections" referenced in Section 5.1 is the same area Ms. Stout refers to as "Former Morris Canal limits (including the basins and wider sections)" in Section 4.1.

The area Ms. Stout refers to as the "Morris Canal's wider sections" is not labeled on her Figures; however, I believe this is represented by the blue polygon on her Figures 7-11 and 7-15. I have not reviewed the method that AECOM used to georeference the 1891 map and was not able to verify the accuracy of the placement of the canal polygon.

Example 3 –In Section 5.1 Ms. Stout also states: "During the late 1920s and early 1930s, Natural Products filled what had been the Morris Canal boat channel with chromium chemical manufacturing wastes. (See Figure 7-11)"

My Comments:

There is no aerial photography taken during the filling activities, nor is any citation provided in conjunction with this statement. Therefore, Ms. Stout cannot determine the composition of material used or the timing of filling activities of the Morris Canal. The photo interpreter could only determine the tone/color, shadow, size, height, texture, shape, pattern and location of this material.

Example 4 – In Section 7.3 titled "1911 Sanborn Fire Insurance Map" Ms. Stout states: "Figure 7-4 shows that the first Natural Products buildings at its Garfield Avenue plant were built upon chromium chemical manufacturing wastes. Chromium chemical manufacturing wastes found in fill within the historical footprint of the first buildings would have had to have come from an off- site source."

My Comments:

Figure 7-4 shows the historical locations of the buildings with a superimposed purple shaded area captioned "Combined Extent of the Green-Gray Mud, COPR, and Mixed Fill with COPR Material". Her assumption does not take into account the timing of disposal or fill activities which potentially took place to create this combined extent area. Ms. Stout's opinion that fill found within the historical footprint of the first buildings had to have come from an off-site source ignores subsequent events such as the grading and filling activities that occurred in the later years with the razing of the original structures and redevelopment of the area.

Ms. Stout also overlays the "Combined Extent of the Green-Gray Mud, COPR, and Mixed Fill with COPR Material" over the 1911, 1932 and 1940 dates. Her decision to overlay this combined area on the dates prior to 1940 could mislead the reader to think that the extents mapped in 2010 were in place on these early years.

Example 5 – Also at Section 7.3 Ms. Stout states: "The original Natural Products buildings at its Garfield Avenue plant were built upon chromium manufacturing wastes, which likely came from the nearby Mutual facility. The distance over Jersey City streets between the Mutual plant and the location of what would become the Natural Products plant is about 2.1 miles. Figure 7-5 shows one route between the two locations starting at Mutual's West Side Avenue plant, to Claremont Avenue, to Garfield Avenue. Trucks could have readily transported such wastes from the Mutual plant to the Natural Products site on these city streets."

My Comments:

Ms. Stout draws conclusions based on speculative theories about the source of materials that were placed on site in early years. There is no photographic evidence, maps, or documents cited in conjunction with her statement which supports her conclusion that waste was taken from the Mutual Plant to the Natural Products Facility and driven across certain specific roads.

Example 6 – In Section 7.5 titled "Circa 1920 Ground Photograph" Ms. Stout states: "It shows Natural Products buildings located immediately adjacent to the main canal boat channel, which is consistent with the building locations shown on the 1919 plat map. The buildings adjacent to the canal boat channel were located within the original (broader) limits of the Morris Canal; and therefore, were constructed on top of areas that had been filled."

My Comments:

The Ground Photograph shows buildings in locations that are generally consistent with locations on the 1919 map. However, there is no indication of the "original (broader) limits of the Morris Canal" on either one of these Figures. Stout's conclusion is not verifiable by viewing the 1919 plat map or 1920 Ground Photograph alone and she cites no other support in conjunction with her statement.

Example 7 – In Section 7.7 "May 1932 and July 1932 Aerial Photographs" Ms. Stout states: "An impoundment with light-toned liquid or sludge was located northeast of the intersection of Carteret Avenue (if extended) and the former Morris Canal channel."

My Comments:

The impoundment appears to contain a liquid but it is unclear from the aerial photography alone if the feature is sludge. The photo interpreter could only determine the visible aspects of the tone/color, shadow, size, height, texture, shape, pattern and location of this feature. Additional information is needed to determine the composition of the liquid and, similar to other Stout conclusions, no other references are cited in conjunction with this statement.

Example 8 – Also in Section 7.7, Ms. Stout states: "Chromium chemical manufacturing wastes found above the meadow mat on Site 137 and the southeastern portion of Site 114 would have been placed there prior to 1932, most likely in the 1920s or earlier."

My Comments:

The earliest images of the waste piles are from 1932. The timing of the earliest placement of these materials "likely in the 1920s or earlier" is speculative. There is no documentation, photographs, or maps that date the placement of material. Her conclusion is not supported by an analysis of any of the maps or photographs and again, no other support is cited in conjunction with this statement.

Example 9 – In Section 7.11 titled "April 28, 1947 Aerial Photograph" Ms. Stout states: "Pits with liquid are visible in the area where the oil tanks had been located."

My Comments:

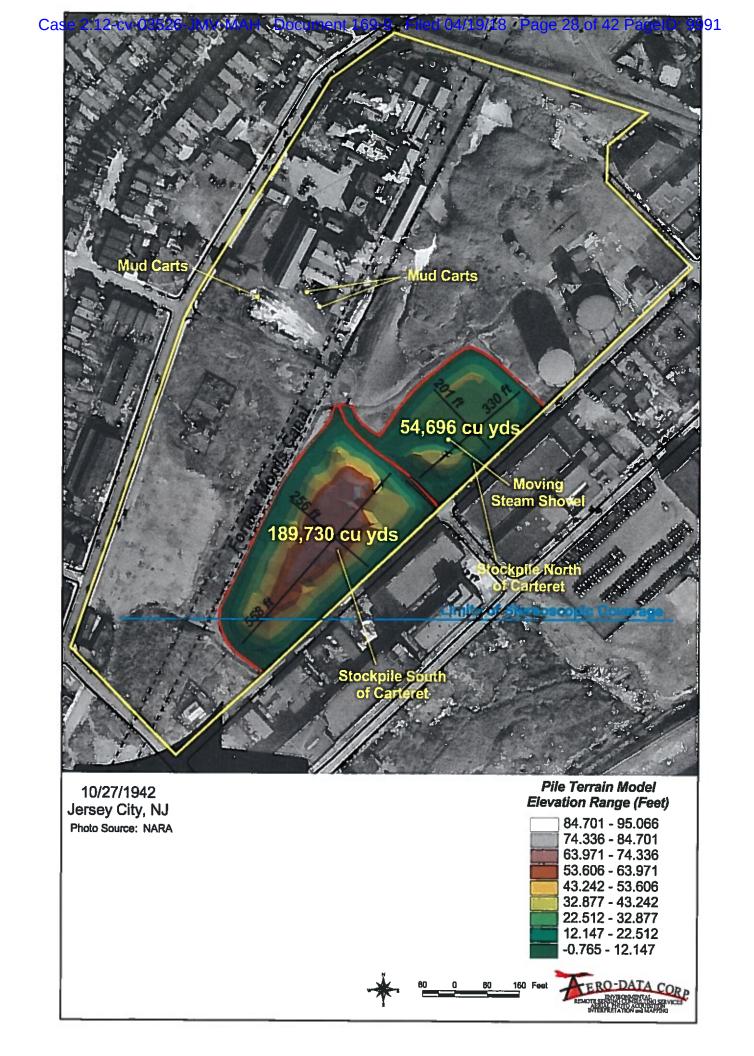
These features appear to be impoundments with liquid within former low areas which were formed by the placement of fill material and/or debris. There is no indication that these are pits from the aerial imagery or maps and Ms. Stout fails to cite any support for her conclusion. Additional impoundments are visible, and mapped by Ms. Stout as "Liquid" to the north and east of these features.

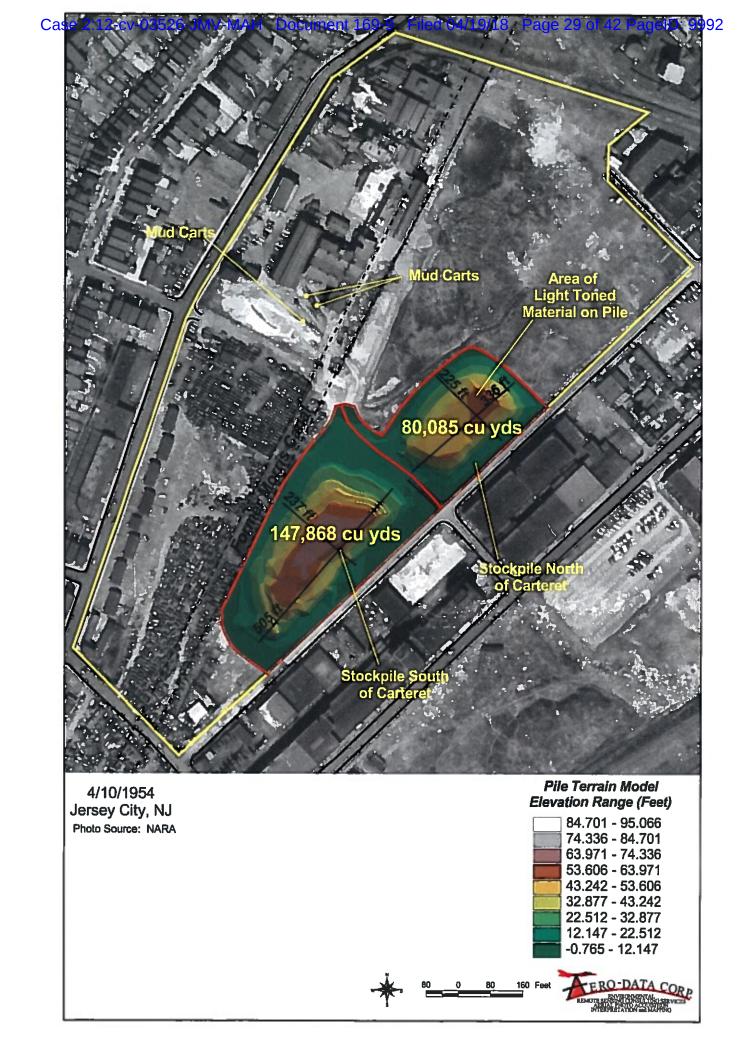
Example 10 – In Section 7.13 titled "April 10, 1954 Aerial Photograph" Ms. Stout states: "Dark-toned material and dark-toned liquid has been dumped on the fill area; and light-toned material and debris have been dumped along the east side of the fill area."

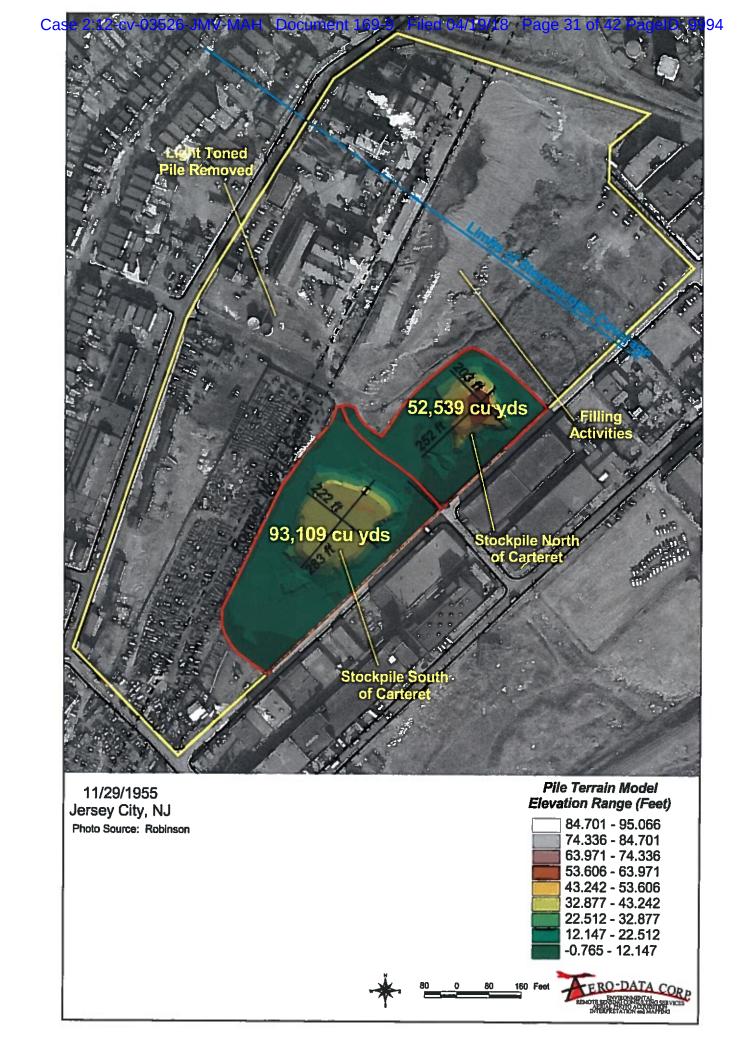
My Comments:

The "dark-toned material and dark-toned liquid" is a slightly impounded area created from light toned filling in the area. It contains liquid but is hydraulically connected to the low area with liquid to the south of the area. It is unclear from the aerials alone if this liquid is actually a dark color or it is just free of turbidity and therefore relatively clear. It is similar in tone to the other liquid areas mapped by Ms. Stout.

Supplemental Report Orthophotos

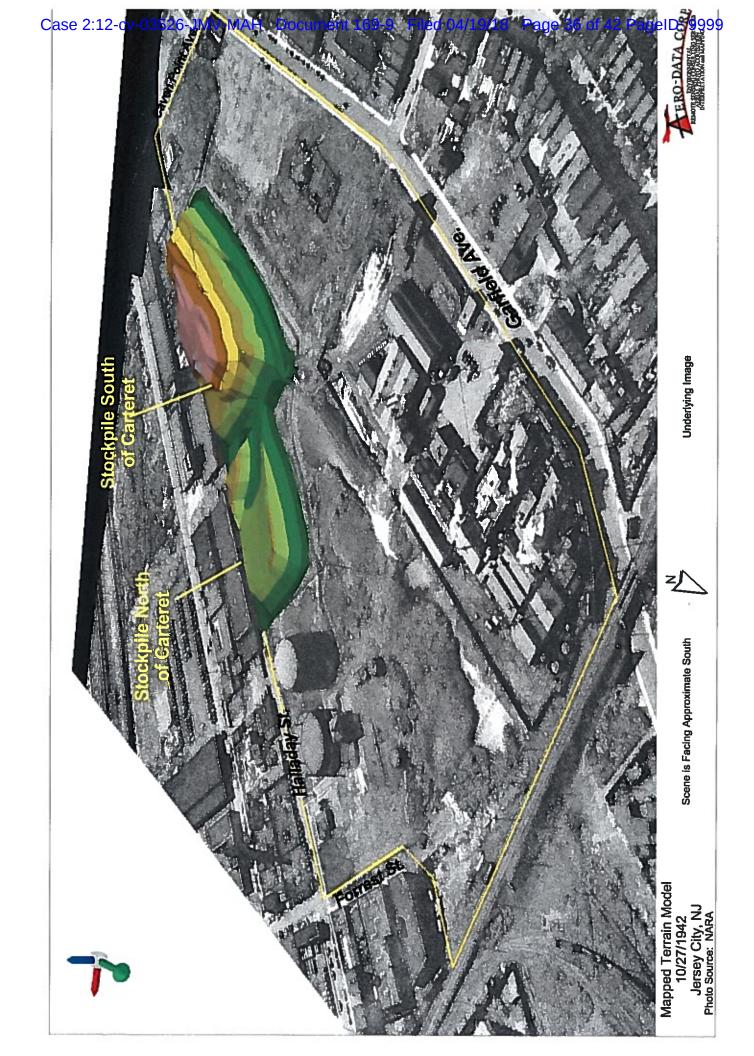


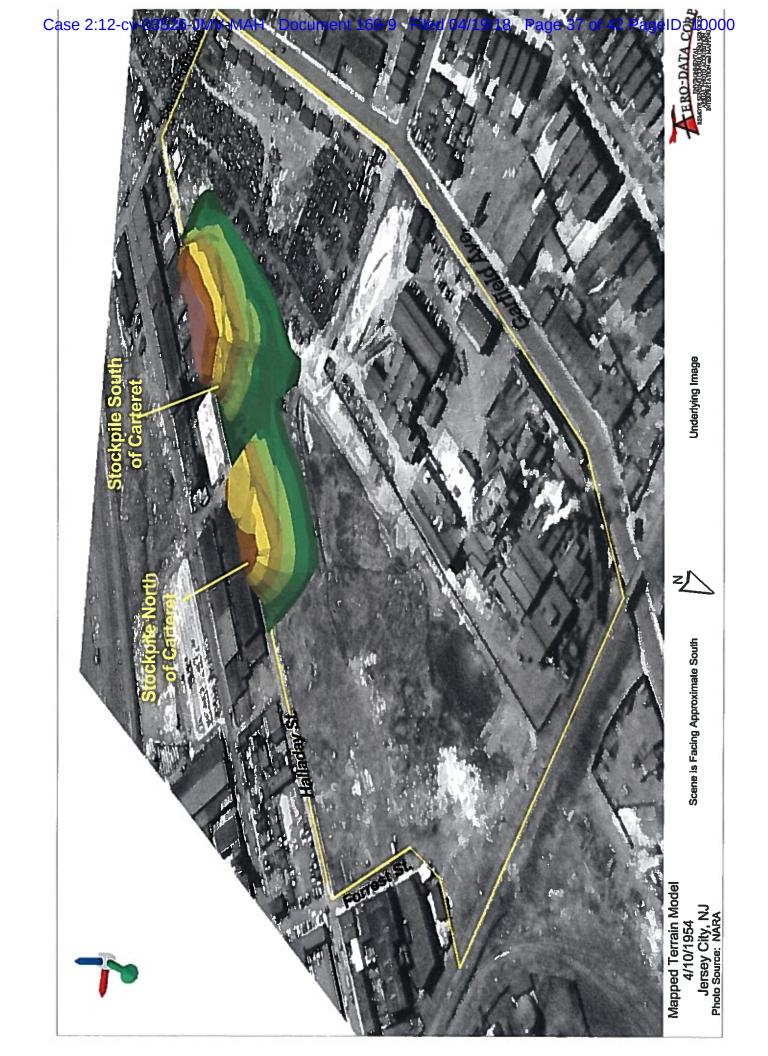


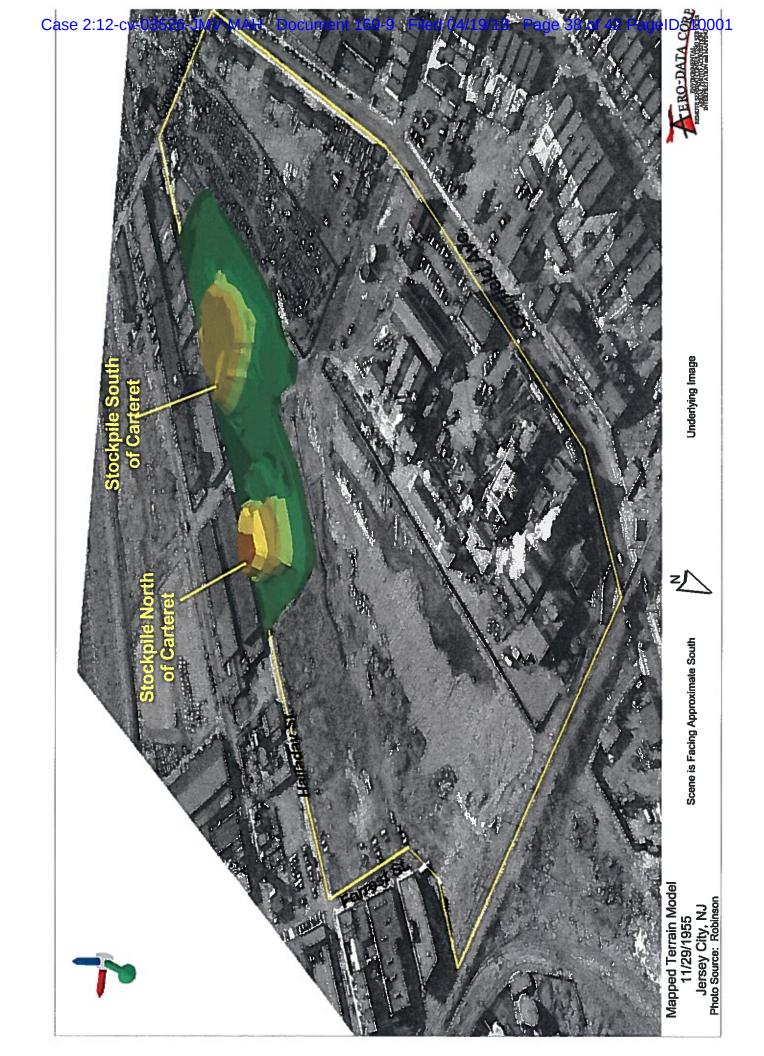


Historical Oblique Aerial Photos

Supplemental Report Stockpile Terrain Model Oblique Views







Supplemental Report Anaglyph 3-D Images



3-D Image 10/27/1942 Jersey City, NJ Photo Source: NARA





3-D Image 11/29/1955 Jersey City, NJ Photo Source: Robinson

Underlying Image

Approximate Scale and North Arrow

Use Glasses for Stereo Viewing